

VIA ECF

The Honorable Judge Jesse M. Furman
U.S. District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 1105
New York, NY 10007

**RE: *Khalil v. Trump*, 1:25-cv-01935-JMF
Motion for Leave to Accept Late Filing**

Dear Honorable Judge Furman:

Counsel for Petitioner in the above-referenced case respectfully submits this letter motion to accept the delayed filing of Petitioner’s Motion for Release Under *Mapp v. Reno*. Although undersigned counsel attempted to file Petitioner’s papers at approximately 11:25pm, prior to the so-ordered deadline of March 14, 2025, at 11:59pm, counsel received an error message: “ERROR: Document is malformed or contains code which may cause an external action (such as launching an application). This PDF document cannot be accepted.” *See* Decl. of Samah Sisay, Exh. A. Several undersigned counsel attempted to file the documents in “flattened” form but received the same error message. *Id.* Ultimately, counsel was able to reformat and re-convert each of the documents—which consisted of numerous documents and exhibits—into new PDFs and was able to file the new versions on the docket. *Id.* Counsel sincerely apologizes for the delay and asks the Court for leave to accept the delayed filings. *Id.* Counsel for Petitioner reached out to counsel for Respondents for their position on this request but understandably did not hear back at this hour. *Id.*

Thank you for your consideration of this submission.

Sincerely,

/s/ Samah Sisay
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